

IN THE DRAWINGS:

The attached sheet of drawings includes changes to Figures 10A-10D, which replaces the original sheet of drawings for Figures 10A-10D. In Figures 10A-10D, previously omitted abbreviation "Fig." has been added.

Attachment: Replacement Sheet

REMARKS

This is intended as a full and complete response to the Office Action dated January 16, 2007, having a shortened statutory period for response extended one month set to expire on May 16, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Drawings

The Examiner objected to the drawings because the titles of Figures 10A-10D are missing the abbreviation --Fig.--. Accordingly, Applicants have amended Figures 10A-10D. Therefore, Applicants respectfully request the objection to the drawings be removed.

Specification

The Examiner objected to the disclosure because the Cross-Reference Related Application section should be updated to indicate that the US application is now a U.S. patent. Further, the Examiner objected to the disclosure due to the length of the abstract. In response, Applicants have amended the disclosure accordingly. Therefore, Applicants respectfully request the objection to the disclosure be removed.

Claim Objections

The Examiner objected to claims 5, 9, 10, 13, 14, 20, 21, 23, and 33 due to informalities. In response, Applicants have amended the claims accordingly. Therefore, Applicants respectfully request the objection to the claims be removed.

Claim Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1, 3-8, 15, 23-28, and 33-35 under 35 U.S.C. § 102(b) as being anticipated by *U.S. 4,648,455 to Luke*. In response, Applicants have amended claims 26 and 33. Additionally, Applicants have cancelled claims 1, 3-8, 15, 23-25, and 28-32.

As amended, claim 26 includes the limitation of a flow path between a well surface and the formation, the flow path including at least one opening in a tubular, the

opening permitting steam flow at a critical flow rate with an annulus/tubing pressure ratio of up to about 0.9 by using at least two apertures in the tubular and a throat and diffuser portion in the opening. As amended, claim 33 includes the limitation of at least two nozzles disposed along the string, each nozzle located in a position of the wellbore adjacent a first zone of interest and a second zone of interest, the nozzles having a throat portion and a diffuser portion, wherein the steam at each zone of interest has a liquid/water ratio based on a configuration of the nozzle and the apertures in the tubular string. *Luke* does not disclose these limitations. In contrast, *Luke* merely discloses an apparatus for injecting high-temperature steam at a selected mass flow rate into a plurality of vertically spaced production formations of a subterranean well. The apparatus includes a plurality of choke devices connected in a series relationship in a tubing string extending to the well surface. Each choke device is positioned immediately above or adjacent to a production formation and defines a flow diversion device which extracts a predetermined portion of steam flow from the main steam flow, moving downwardly through the tubing string and directs such diverted steam portion into the inlet chamber of a Venturi passage. The steam is accelerated by the Venturi passage to its critical mass flow rate and is discharged into the production formation. Thus, *Luke* fails to disclose that the steam flow is at a critical flow rate with an annulus/tubing pressure ratio of up to about 0.9 by using at least two apertures in the tubular and a throat and diffuser portion in the opening, as recited in claim 33. Additionally, *Luke* fails to disclose that the steam at each zone of interest has a liquid/water ratio based on a configuration of the nozzle and the apertures in the tubular string, as recited in claim 33. This failure precludes *Luke* from anticipating claims 26 and 33. Therefore, Applicants respectfully request the 102(b) rejection of claims 26 and 33 be removed and allowance of the same. Additionally, claim 27 depends from claim 26 and claims 34-35 depend from claim 33 and these claims are allowable for at least the same reasons as claims 26 and 33.

The Examiner rejected claims 36 and 37 under 35 U.S.C. § 102(e) as being anticipated by U.S. 6,318,464 to *Mokrys*. In response, Applicants have amended claims 36 and 37.

As amended, claim 36 includes the limitation of at least one nozzle between the source and each wellbore, wherein the nozzle and the apertures in a string of tubulars are configured such that a predetermined flow rate of steam is provided to each wellbore. As amended, claim 37 includes the limitation of at least one nozzle in the flow path, the nozzle and the apertures in a tubular string are configured for controlling a flow of steam using critical flow. *Mokrys* does not disclose these limitations. Rather, *Mokrys* merely discloses an apparatus for injecting gas into multiple wellbores by utilizing a narrow nozzle, wherein the narrow nozzle is configured to cause vaporization of liquid propane (see *Mokrys*, col. 11, lines 5-15). As such, *Mokrys* fails to disclose a nozzle and apertures in a string of tubulars that are configured such that a predetermined flow rate of steam is provided to each wellbore, as recited in amended claim 36. Additionally, *Mokrys* fails to disclose a nozzle and apertures in a tubular string that are configured for controlling a flow of steam using critical flow, as recited in amended claim 37. This failure precludes *Mokrys* from anticipating claims 36 and 37. Therefore, Applicants respectfully request the 102(b) rejection of claims 36 and 37 be removed and allowance of the same. Additionally, claims 38-39 depend from claim 37 and these claims are allowable for at least the same reasons as claim 37.

Claim Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 29-32 under 35 U.S.C. § 103(a) as being obvious over *Luke* in view of US 5,990,370 to *Sims*. The Examiner also rejected claims 40-42 under 35 U.S.C. § 103(a) as being obvious over US 4,336,839 to *Wagner, et al.* in view of U.S. 5,141,054 to *Alameddine, et al.* Additionally, the Examiner rejected claims 2, 40, 41, 45, and 46 under 35 U.S.C. § 103(a) as being obvious over *Luke* in view of *Alameddine, et al.* Applicants have cancelled claims 2, 29-32, 40-42, 45, and 46, thereby obviating the rejections.

Allowable Subject Matter

The Examiner objected to claims 9-14, 16-22, 43, and 44 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In

response, Applicants have rewritten claims 9-14, 16-22, 43, and 44 as new claims 47-52 and 59-44, respectively. Therefore, Applicants believe that new claims 47-52 and 59-44 are in condition for allowance and respectfully request the same. Additionally, since new claims 53-58 depend from claim 47 and new claims 68-69 depend from claim 66, these claims are allowable for at least the same reasons as claims 47 and 66.

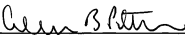
New Claims

New claims 70-78 have been added to claim aspects of the present invention. Applicants submit that no new matter has been added. Additionally, Applicants believe that the references cited in the Office Action do not disclose a method of injecting steam into a formation, wherein the method includes introducing the steam into a wellbore via a string of tubing, the tubing having a first injection point axially spaced from a second injection point and regulating the steam introduced at each injection point by varying a nozzle arrangement at the injection point, wherein the nozzle arrangement includes a nozzle having a throat portion and a diffuser portion, as recited in new claims 70-78. Therefore, Applicants believe that new claims 70-78 are in condition for allowance and respectfully request the same.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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